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FILED
STATE OF CALIFORNIA
PHYSICAL THERAPY BOARD OF CALIFORNIA

SACRAMENTO, CA November 7, 2006
BY CMetz ANALYST

BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 1D-2006-64678

LAVRENTI LITVINOFF
23821 Hillhurst Drive #43
Laguna Niguel, CA 92677

A C C U S A T I O N

Physical Therapy License No. PT-6710,
Respondent.

Complainant alleges:

PARTIES

1. Steven K. Hartzell (Complainant) brings this Accusation solely in his official capacity as the Executive Officer of the Physical Therapy Board of California (Board).
2. On or about March 26, 1974, the Board issued Physical Therapy License Number PT6710 to Lavrenti Litvinoff (Respondent). His license expired on February 28, 2006, and has not been renewed.

JURISDICTION

3. This Accusation is brought before the Physical Therapy Board of California (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 141 of the Code states:

“(a) For any licensee holding a license issued by a board under the jurisdiction of

1 the department, a disciplinary action taken by another state, by any agency of the federal
2 government, or by another country for any act substantially related to the practice
3 regulated by the California license, may be a ground for disciplinary action by the
4 respective state licensing board. A certified copy of the record of the disciplinary action
5 taken against the licensee by another state, an agency of the federal government, or
6 another country shall be conclusive evidence of the events related therein.

7 “(b) Nothing in this section shall preclude a board from applying a specific
8 statutory provision in the licensing act administered by that board that provides for
9 discipline based upon a disciplinary action taken against the licensee by another state, an
10 agency of the federal government, or another country.”

11 5. Section 2661.5 of the Code provides, in pertinent part:

12 “(a) In any order issued in resolution of a disciplinary proceeding before the
13 board, the board may request the administrative law judge to direct any licensee found
14 guilty of unprofessional conduct to pay to the board a sum not to exceed the actual and
15 reasonable costs of the investigation and prosecution of the case.

16 “(b) The costs to be assessed shall be fixed by the administrative law judge and
17 shall not in any event be increased by the board. When the board does not adopt a
18 proposed decision and remands the case to an administrative law judge, the
19 administrative law judge shall not increase the amount of the assessed costs specified in
20 the proposed decision.

21 “(c) When the payment directed in an order for payment of costs is not made by
22 the licensee, the board may enforce the order of payment by bringing an action in any
23 appropriate court. This right of enforcement shall be in addition to any other rights the
24 board may have as to any licensee directed to pay costs.

25 **FIRST CAUSE FOR DISCIPLINE**

26 (Out of State Discipline)

27 6. Respondent is subject to disciplinary action under section 141 of the Code
28 in that a disciplinary action was taken by another state, related to the practice regulated by the

1 California license. The circumstances are as follows:

2 7. On or about May 23, 2006, the Arizona Board of Physical Therapy
3 revoked a physical therapy license No. 2382, issued to Respondent, Lavrenti Litvinov.

4 8. Respondent's Arizona physical therapy license was revoked for the
5 following reasons: On or about August 9, 2004, Respondent submitted his application for
6 renewal of his Arizona license for the period from 2004 through 2006. In that application,
7 Respondent represented that he completed 20 hours of continuing education for the subject
8 compliance period, as required for license renewal in Arizona. The application was incomplete,
9 because he did not include his current business address or telephone number on the Arizona
10 renewal application. As a result, the renewal application was returned to him.

11 9. On or about September 1, 2006, Respondent re-submitted his application
12 for renewal of his Arizona physical therapy license for the period of 2004 to 2006, and again
13 represented that he had completed the requisite 20 hours of continuing education for the subject
14 compliance period, as required by the laws of the State of Arizona for renewal of his physical
15 therapy license in that state. That renewal application was one day late.

16 10. Because his renewal application was late, the Arizona Physical Therapy
17 Board automatically subjected Respondent's application to an audit of his continuing education
18 requirements. On or about November 14, 2004, Respondent e-mailed a representative of the
19 Arizona Physical Therapy Board. In his email, Respondent contradicted his earlier avowal of
20 compliance with the continuing education requirements. He indicated that he had been in private
21 practice in Mexico and had not participated in any continuing education.

22 11. Respondent failed to respond to all subsequent attempts by the Arizona
23 Physical Therapy Board to contact him and to resolve that matter informally. His Arizona
24 physical therapy license was then revoked.


25 12. The California Physical Therapy Board was informed of the adverse action
26 taken in Arizona, and attempted to contact the Respondent at his address of record, as well as at
27 his other known address, but all communications addressed to him were returned as
28 undeliverable.

1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters
3 herein alleged, and that following the hearing, the Physical Therapy Board of California issue a
4 decision:

- 5 1. Revoking or suspending Physical Therapy License Number PT6710,
6 issued to Lavrenti Litvinoff;
- 7 2. Ordering him to pay the Physical Therapy Board of California the
8 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
9 Professions Code section 2661.5;
- 10 3. Taking such other and further action as deemed necessary and proper.

11 DATED: 11/7/06.

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14 STEVEN K. HARTZELL
15 Executive Officer
16 Physical Therapy Board of California
17 Department of Consumer Affairs
18 State of California
19 Complainant
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